

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

MARÍA ALSINA ORTIZ, ET. AL.	*	CIVIL NO. 98-1893 (JAG)
AND/OR THE ESTATE OF MR.	*	
ORLANDO OCASIO ALSINA	*	
COMPOSE OF MARÍA ALSINA	*	
ORTIZ	*	
	*	PLAINTIFFS DEMAND TRIAL
PLAINTIFFS	*	
	*	BY JURY
VS.	*	
	*	
MS. ZOE LABOY IN HER PERSONAL	*	
CAPACITY, JOHN DOE IN	*	
HIS PERSONAL CAPACITY AND,	*	
ET. ALS.	*	
	*	
DEFENDANTS	*	
	*	
* * * * *		

**URGENT MOTION REQUESTING ORDER**

**TO THE HONORABLE COURT:**

**COME NOW**, Plaintiffs through their undersigned attorney, and respectfully state and pray:

1. Trial is scheduled on November 28, 2005. Plaintiff needs to have present at the trial inmates that have been notified as witnesses in the case. In order that the inmates be subpoena for trial, plaintiff needs the last physical known address of each inmate, because most of them are in other locations as of this date.

2. Plaintiff hereby provides the names and last known address of each inmate.

3. In order that plaintiff could subpoena the inmates for trial, plaintiff needs the names of the specific correctional facilities, building numbers and cells in which those inmates are present or will be present during the next 40 days. Furthermore, if the inmates are not more under the custody of the Administration of Correction, then plaintiff needs the last known residential address of the inmates and the last known address of any private institution in which the inmates could be subject to their custody.

4. Plaintiff's attorney is also requesting to order the wardens, correctional employees and correctional officers to allow plaintiff's attorney to access the inmates before and during the trial, at the physical facilities in which the inmates are located, but subject to the security measures. The reason why plaintiff requests this order is so that the plaintiff could prepare her case for trial.

5. The inmates that plaintiff needs the information requested above are:

- a. Felix A. Ramos Moulrier  
Cárcel Regional de Bayamón #5101 "2E"  
Bayamón, PR  
Calle 21 AA 29  
Jardines de Palmarejo  
Barrio San Isidro  
Canovanas, P.R. 00729  
Tel. 256-0556
- b. Nathaniel Mojica Reyes

Carcel Regional de Guayama  
Colonia Los Dolores  
Carr. # 3  
Interior 7710  
Guayama, P.R.

- c. Javier Del Valle Llopiz  
Hogar Adaptación Social de Carolina  
Calle Amadeous # 8 Altos  
Carolina, P.R. 00985
- d. Gilberto Rivera Rodríguez  
Hogar Adaptación Social de Río Piedras  
Calle Norte #64  
Río Piedras, P.R. 00925
- e. Erick Diaz Davila  
Hospital de Psiquiatría Correccional  
Centro Médico  
Río Piedras, PR  
Barrio Lomas Jagua  
Naranjito, P.R.  
(787) 869-7079
- f. Luis López Negrón  
Wackenhut PR, Inc.  
Calle Final #28  
Barrio Juan Sánchez, Centro Industrial Luchetti  
Bayamón, P.R. 00961
- g. Carmelo Román Hernández  
Hogar de Adaptación Social de Carolina  
Calle Amadeos # 8 Altos  
Carolina, P.R. 00985
- h. Wilson García Cueva  
Hogar de Adaptación Social de Humacao  
Ave. Roosevelt # 5  
Humacao, P.R. 00791
- I. Edwin Rivera  
Carcel Regional de Bayamón  
Detrás de la Comandancia Norte de Bayamón  
Carr. # 5  
Bayamón, P.R.

- j. Edwin Meléndez Meléndez  
Carcel Regional de Bayamón  
Detrás de la Comandancia Norte de Bayamón  
Carr. # 5  
Bayamón, P.R.
- k. Javier Rodríguez Torred  
Hogar de Adaptación Social de Carolina  
Calle Amadeous # 8 Altos  
Carolina, P.R.

6. A federal court may enjoin a state officer to refrain from future actions that violate federal law or take prospective actions to comply with constitutional mandates. *Ex Parte Young*, 209 U.S. 123(1908).

**WHEREFORE,** Plaintiff very respectfully requests this Honorable Court to order the Secretary of the Administration of Correction, wardens and employees of the Administration of Correction, that have available the information requested above, to notify it to attorney Glenn Carl James within the next five(5) days, at Calle Peñuelas 65-A, Hato Rey, P.R.00918. Second, to order the wardens, correctional employees and correctional officers to allow plaintiff's attorney to access the inmates before and during the trial.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY:** I hereby certify that on 28 day of October, 2005 I electronically filed the foregoing with the Clerk of the Court, using CM/ECF system which will send notification of such filing: laaparicio@justicia.gobierno.pr,

r u r o r o d r i g u e z @ j u s t i c i a . g o b i e r n o . p r ,  
joestades@justicia.gobierno.pr, josgonzalez@justicia.gob.pr, and  
lavyaparicio@yahoo.com.

In San Juan, Puerto Rico, this 28 day of October, 2005.

s/ Glenn Carl James  
Glenn Carl James  
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